

FOOD STAMP PROGRAM REQUEST FOR REGULATION INTERPRETATION

INSTRUCTIONS: Complete items 1 - 10 on the form. Use a separate form for each policy interpretation request. Retain a copy of the FS 24 for your records. For counties asking for policy interpretations, submit the question directly to a FRAT representative via e-mail. For other organizations (e.g., Quality Control, Administrative Law Judges), submit questions directly to the Food Stamp Policy Implementation Unit or Employment and Special Projects Unit representative via e-mail.

1. RESPONSE NEEDED DUE TO: <input checked="" type="checkbox"/> Policy/Regulation Interpretation <input type="checkbox"/> QC <input type="checkbox"/> Fair Hearing <input type="checkbox"/> Immediate Need/Emergency Services <input type="checkbox"/> Other:	5. DATE OF REQUEST: August 18, 2011 <table border="1" style="float: right;"> <tr> <td>NEED RESPONSE BY:</td> <td>ASAP</td> </tr> </table>	NEED RESPONSE BY:	ASAP
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2. REQUESTOR NAME:	6. COUNTY/ORGANIZATION: Sutter County		
3. PHONE NO.:	7. SUBJECT: Certification Period		
4. REGULATION CITE(S): 63-504.1; 63-504.111	8. REFERENCES: <i>(Include ACL/ACIN, court cases, etc. in references)</i> NOTE: All requests must have a regulation cite(s) and/or a reference(s).		

9. QUESTION: (INCLUDE SCENARIO IF NEEDED FOR CLARITY):

Does the CF certification period begin with the first month of eligibility or the month of application?

Example

Customer applied on June 15th for CF benefits in Sutter County. Customer has already received CF benefits in the month of June from another State. Sutter County denies benefits for June and grants for July 1.

10. REQUESTOR'S PROPOSED ANSWER:

Sutter County believes that per 63-504.1 the customer's certification period would begin with the first month determined eligible which in this example is July 1 and run through June 30 of the following year.

The C-IV system bases the certification period for grant notices on the application date. Sutter County help desk staff submitted a ticket to C-IV citing 63-504.1 stating the certification period should begin the first month the customer is determined eligible.

The response we received from C-IV cited 63-504.111 which states the certification period shall generally be the month of application, even if the eligibility is not determined until a subsequent month.

11. FRAT RESPONSE TO COUNTY QUESTION:

12. STATE POLICY RESPONSE (FSPIU USE ONLY):

C-IV system is correct. MPP Section 63-504.1 provides that certification periods will be the first month for which the household is eligible to participate (e.g., at recertification). The certification period cannot exceed 12 months, except as specified in section 63-504.13 and .14. However, MPP Section 63-504.111 provides that certification periods shall conform to calendar or fiscal months, except that for initial application where benefits are prorated, the beginning date of certification period shall be the date the application was filed with the CWD. To respond to your scenario above, the certification period would begin June 15th because benefits are prorated from the date the application was filed with the CWD.

FOR FRAT USE

DATE RECEIVED:	DATE RESPONDED TO COUNTY:	DATE FORWARDED TO STATE:
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